

HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WESTBORO CONDOMINIUM
ASSOCIATION, a Washington Non-Profit
Corporation,

Plaintiff,

v.

COUNTRY CASUALTY INSURANCE
COMPANY, an Illinois Corporation; COUNTRY
MUTUAL INSURANCE COMPANY, an Illinois
Corporation; EAGLE WEST INSURANCE
COMPANY, a California Corporation; and DOE
INSURANCE COMPANIES 1-10,
Defendants,

Defendants.

NO. 2:21-cv-00685-BJR

STIPULATED MOTION AND ORDER TO
CONTINUE DEADLINES FOR THE
DISCLOSURE OF EXPERT WITNESSES,
DISCOVERY TO BE COMPLETED, AND
FOR DISPOSITIVE MOTIONS TO BE
FILED

I. STIPULATED MOTION

Come now, Plaintiff Westboro Condominium Association (“Association”) and Defendants Country Casualty Insurance Company and Country Mutual Insurance Company (hereby collectively referred to as “Country Mutual”), by and through their respective counsel, and stipulate to this motion for a continuance of the deadlines for the disclosure of expert witnesses, completion of discovery, and for dispositive motions to be filed.¹ Counsel for the Association and Country Mutual have met and conferred and propose an extension of the following deadlines:

¹ The Association previously resolved its claims against Defendant Eagle West Insurance Company (“EWIC”). EWIC was terminated from the lawsuit effective December 29, 2021 (see Dkt. #20).

	Current Deadline	Proposed Deadline
Expert Witness Disclosure under Fed. R. Civ. P. 26(a)(2)	05/23/2022	06/22/2022
Discovery Completed	06/22/2022	07/22/2022
Dispositive Motions Due	07/22/2022	08/22/2022

II. GOOD CAUSE SHOWN

Pursuant to LCR 16(b)(6), a scheduling order may be modified “only for good cause and with the judge’s consent.” Good cause exists here because the parties are currently engaged in discussion regarding settlement of this matter. For purposes of judicial economy, the parties propose that the deadlines set forth above be extended approximately thirty (30) days to allow the parties time to exchange expert disclosures, take depositions, and draft and file dispositive motions after the parties have fully explored whether amicable resolution in this matter is possible and before significant costs are incurred on behalf of both parties. No previous extensions of time have been requested or granted by the Court in this matter, and this extension is not made for purposes of delay, but rather to permit the parties additional time to attempt to resolve this matter amicably without incurring substantial further costs or requiring additional time and resources on behalf of the Court if possible.

The parties respectfully request that the Court extend the currently scheduled deadlines as set forth above. Trial in this matter is currently scheduled for December 19, 2022. The parties are not requesting an extension of any additional deadlines. A proposed order is included herewith.

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/s/ Jerry H. Stein

/s/ Justin D. Sudweeks

/s/ Daniel J. Stein

/s/ Jessica R. Burns

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STIPULATED MOTION AND ORDER TO CONTINUE
DEADLINES FOR THE DISCLOSURE OF EXPERT
WITNESSES, DISCOVERY TO BE COMPLETED, AND
FOR DISPOSITIVE MOTIONS TO BE FILED - 2

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Attorneys for Defendants Country Casualty Insurance

Company and Country Mutual Insurance Company

ORDER

Based on the above Stipulated Motion, and finding good cause, the Court hereby orders that the following deadlines are extended as follows:

	Current Deadline	Proposed Deadline
Expert Witness Disclosure under Fed. R. Civ. P. 26(a)(2)	05/23/2022	06/22/2022
Discovery Completed	06/22/2022	07/22/2022
Dispositive Motions Due	07/22/2022	08/08/2022

Note that the Court has set a Dispositive Motions Deadline of August 8, 2022, not August 22, 2022 as the parties requested. No other deadlines or events are altered.

DATED this 19th day of May, 2022.



Barbara Jacobs Rothstein
U.S. District Court Judge

Presented by:

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/s/ Jerry H. Stein

/s/ Justin D. Sudweeks

/s/ Daniel J. Stein

/s/ Jessica R. Burns

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DEADLINES FOR THE DISCLOSURE OF EXPERT
WITNESSES, DISCOVERY TO BE COMPLETED, AND
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